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- and -

THE LAW OFFICES OF MICHAEL M. MULDER  
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Michael M. Mulder\*  
Elena N. Liveris\*  
*\*Pro hac application forthcoming*

*Attorneys for Richard Bruce and Ronald Olbrysh*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al*,

Debtors.

Case No: 18-23538 (RDD)

Chapter 11

(Jointly Administered)

**VERIFIED STATEMENT PURSUANT TO RULE 2019  
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the law firms of Wollmuth, Maher, & Deutsch LLP and Michael M. Mulder (collectively, the “Firms”), hereby provide notice that they are representing more than one creditor in the above-captioned chapter 11 case (the “Chapter 11 Case”), and state as follows:

1. On or about May 15, 2019, Michael M. Mulder was retained to represent the Retirees of Sears Holding Corporate (the “Creditors” or “Sears Retirees”) in the above-captioned

Chapter 11 Cases. On or about May 15, 2019, the Creditors retained Wollmuth, Maher, & Deutsch LLP as local co-counsel.

2. As of the date of this Verified Statement, the Firms only represent the Creditors in the Chapter 11 Case.

3. As of the date of this Verified Statement, the Creditors are the only creditors or other parties in interest in the Chapter 11 Case for which the Firms are required to file a Verified Statement pursuant to Rule 2019.

4. In accordance with Bankruptcy Rule 2019, Exhibit A lists each Creditor's address and "the nature and amount of each disclosable economic interest" held by each Creditor.

5. Nothing contained in this Verified Statement is intended or shall be construed to constitute (i) a waiver or release of the rights of the Creditors to have any final order entered by, or other exercise of the judicial power of the United States performed by, an Article III court; (ii) a waiver or release of the rights of the Creditors to have any and all final orders in any and all non-core matters entered only after de novo review by a United States District Judge; (iii) consent to the jurisdiction of the Court over any matter; (iv) an election of remedy; (v) a waiver or release of any rights the Creditors may have to a jury trial; (vi) a waiver or release of the right to move to withdraw the reference with respect to any matter or proceeding that may be commenced in the Chapter 11 Case against or otherwise involving the Creditors; or (vii) a waiver or release of any other rights, claims, actions, defenses, setoffs or recoupments to which the Creditors may be entitled, in law or in equity, under any agreement or otherwise, with all of which rights, claims, actions, defenses, setoffs or recoupments being expressly reserved.

6. The Firms reserve the right to amend or supplement this Verified Statement in accordance with the requirements of Bankruptcy Rule 2019.

Dated: New York, New York  
May 28, 2019

Respectfully Submitted,

By: /s/ James N. Lawlor

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Olbrysh*

**EXHIBIT A**

Richard Bruce  
145 S. York St.  
Unit 228  
Elmhurst, IL 60126  
Creditor and Sears retiree

Ronald Olbrysh  
624 E. Central Ave  
Lombard, IL 60148  
Creditor and Sears retiree

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was filed electronically on May 28, 2019 with the United States Bankruptcy Court for the Southern District of New York and was served electronically on all parties of record in accordance with the method established under this Court's CM/ECF Administrative Procedures and Local Rules, as well as by US Mail upon the following parties:

Chambers of the Honorable Robert D. Drain  
United States Bankruptcy Court for the Southern District of New York  
300 Quarropas Street, Room 248  
White Plains, New York 10601

Brookfield Property REIT Inc.  
Attn: Kristen N. Pate  
350 N. Orleans St., Suite 300  
Chicago, IL 60654-1607  
(Counsel to Brookfield Property REIT Inc., as Agent)

BST International Fashion Ltd.  
Attn: A.R. Shrinivasan, Managing Director  
39 Wang Kwong Rd, Ste 2301B, Skyline Tower, Kowloon Bay  
Kowloon  
Hong Kong

Fein, Such & Crane, LLP  
Attn: Tammy L. Terrell Benoza, Esq.  
1400 Old Country Road, Suite C103  
Westbury, NY 11590  
(Counsel to Movant Bayview Loan Servicing, LLC, as servicer for The Bank of New York Mellon FKA the Bank of New York, as Trustee (CWALT 2007-HY4))

Fein, Such & Crane, LLP  
Attn: Tammy L. Terrell Benoza, Esq.  
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Parsippany, NJ 07054  
(Counsel to Movant Bayview Loan Servicing, LLC, as servicer for The Bank of New York Mellon FKA the Bank of New York, as Trustee (CWALT 2007-HY4))

Frenkel, Lambert, Weiss, Weisman & Gordon, LLP  
Attn: Michelle C. Marans, Esq.  
53 Gibson Street

Bay Shore, NY 11706  
(Counsel to Select Portfolio Servicing, Inc. as servicer for U.S. Bank National Association, as Trustee, in trust for the registered holders of Citigroup Mortgage Loan Trust 2007-AHL2, Asset-Backed Pass-Through Certificates, Series 2007-AHL2, Mortgage Pass-Through Certificates)

Linebarger Goggan Blair & Sampson, LLP  
Attn: Diane Wade Sanders  
P.O. Box 17428  
Austin, TX 78760  
(Counsel to Aransas County, Bee County, Jim Wells CAD, Nueces County, City of Harlingen, Hidalgo County, Victoria County, Blanco CAD, Harlingen CISD, Cameron County)

Milbank, Tweed, Hadley & McCloy LLP  
Attn: Andrew M. Leblanc  
1850 K Street, NW, Suite 1100  
Washington, DC 20006  
(Counsel to Cyrus Capital Partners, L.P.)

Montee & Associates  
Attn: Kevin P. Montee, Esq.  
1250-I Newell Ave., Suite 149  
Walnut Creek, CA 94596  
(Counsel to Creditor Hudson Concourse, LLC)

Ohio Department of Taxation  
Attn: Office of the Ohio Attorney General  
1600 Carew Tower  
441 Vine Street  
Cincinnati, OH 45202  
(Counsel to Ohio Department of Taxation)

Sears Holding Corporation  
Attn: Stephen Sitley Esq., Luke J. Valentino, Esq., Rob Riecker  
3333 Beverly Road  
Hoffman Estates, IL 60179  
(Debtors)

The Bank of New York Mellon Trust Company  
Attn: Corporate Trust Administration  
101 Barclay St., Floor 8W  
New York, NY 10286  
(Successor Trustee for the SRAC Unsecured PIK Notes, SRAC Unsecured Notes, and the SRAC Medium Term Notes)

Wilmington Trust, National Association  
Attn: Sears Holdings Corp. Administrator  
Corporate Capital Markets  
50 South Sixth Street, Suite 1290  
Minneapolis, MN 55402  
(Indenture Trustee for the Second Lien Notes)

Wilmorite Management Group LLC  
Attn: Donald C. Cowan, Jr.  
1265 Scottsville Road  
Rochester, NY 14624  
(Counsel to Eastview Mall, LLC, Greece Ridge, LLC & The Marketplace)

/s/ Cassandra Postighone

Cassandra Postighone